


CRIMINAL COMPLAINT
(Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America v. Carlos JUAREZ DOB: 1979; U.S. Citizen	DOCKET NO. MAGISTRATE'S CASE NO. 23-04721MJ
Complaint for violation of Title 18, United States Code, § 554(a)	
<p>On or about June 26, 2023, in the District of Arizona, Carlos JUAREZ knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: one Tisas 1911 handgun and two firearm magazines, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774; all in violation of Title 18, United States Code, Section 554(a).</p>	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:	
<p>On June 26, 2023, at approximately 2:30 p.m., Carlos JUAREZ was leaving the United States through the vehicle lanes of the DeConcini Port of Entry (POE) in Nogales, in the District of Arizona. JUAREZ was driving a black 2014 Land Rover with Florida license plate "QDLK51" with Panfilo CASTRO, whom JUAREZ identified as his uncle, as a passenger in the vehicle. Customs and Border Protection (CBP) officers conducted a stop on the vehicle, and received a negative outbound declaration for weapons, ammunition, and monetary instruments over \$10,000. CBP officers asked JUAREZ where he was coming from, and he stated he had driven from Florida and arrived around mid-morning today. JUAREZ further said he was heading to Nogales, Sonora, to visit his daughter and her mother. CBP officers asked JUAREZ and CASTRO for their driver's licenses. CBP noticed JUAREZ was being very short and direct with his answers and that CASTRO was shaking a lot and struggling to remove his license from his wallet. CBP officers then referred both of them to secondary for further inspection. At the secondary checkpoint, CBP officers asked JUAREZ to step out of the vehicle and place his hands on the vehicle door. CBP officers conducted an immediate pat down of JUAREZ and felt the handle of a handgun in JUAREZ's waistband. CBP also found an empty magazine in JUAREZ's right cargo pocket. JUAREZ agreed to waive his <i>Miranda</i> rights and speak with the responding HSI agent. JUAREZ told the agent that he saw the signs that weapons are prohibited in Mexico and knows it is illegal to bring weapons into Mexico. JUAREZ said he carries a firearm on him all the times in the United States and forgot he had a pistol in his waistband. JUAREZ stated he had been given the pistol a week or so prior by someone in Tucson who he only knows by the name "Veintesiete" (27), but did not know the real name or have a phone number for "Veintesiete." The handgun and magazines found on JUAREZ'S person qualify as United States Commerce Control List items and therefore are prohibited by law for export from the United States into Mexico without a valid license. JUAREZ did not have a license or any other lawful authority to export these items from the United States into Mexico.</p>	
MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A	
DETENTION REQUESTED Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT ELIZABETH M GUGGISBERG <small>Digitally signed by ELIZABETH M GUGGISBERG Date: 2023.10.17 17:29:40 -06'00'</small>
AUTHORIZED BY AUSA <i>Matthew C. Cassell</i>	OFFICIAL TITLE HSI Special Agent Elizabeth Guggisberg
Sworn by telephone <input checked="" type="checkbox"/>	
SIGNATURE OF MAGISTRATE JUDGE¹⁾ 	DATE October 17, 2023

1) See Federal Rules of Criminal Procedure Rules 3, 4, 5, and 54